

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network Rationalization
Service Changes, 2012

Docket No. N2012-1

DOUGLAS F. CARLSON
FOLLOW-UP INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS TO UNITED STATES POSTAL SERVICE
WITNESS GREG WHITEMAN (DFC/USPS-T12-10-12)

March 2, 2012

Pursuant to sections 25–27 of the *Rules of Practice*, I hereby submit interrogatories and requests for production of documents to United States Postal Service witness Greg Whiteman.

The instructions contained in my interrogatories DFC/USPS-T12-1–9 are incorporated herein by reference.

Respectfully submitted,

Dated: March 2, 2012

DOUGLAS F. CARLSON

DFC/USPS-T12-10. Please refer to your response to DFC/USPS-T12-1(b).

Please respond to DFC/USPS-T12-1(b) without speculating about any aspect of the question, including the question's motivation, underlying intent, or breadth, and while following the instructions preceding interrogatories DFC/USPS-T12-1–9, including, but not limited to, the definition of “all documents.”

DFC/USPS-T12-11. Please refer to your testimony at page 4, lines 1–5 and your response to DFC/USPS-T12-2. Please identify and provide all information known to you in 2011 or 2012, including findings of market research of any type, that does not or may not support your statement that changes to service standards “would have a limited impact” on the “mailing behavior” and “use of the internet as an alternative to mail” of “most consumers and small commercial organizations.”

DFC/USPS-T12-12. Please refer to your response to DFC/USPS-T12-5. Please identify and provide all information known to you in 2011 or 2012, including findings of market research of any type, that does not or may not support your statement that “the impact on volume, revenue and contribution from the changes in the service standards will be a reduction of 2.9 billion pieces or 1.7 percent of total volume, producing a loss in revenue of \$1.3 billion or two percent, and a loss in contribution of \$499 million or two percent, using FY2010 volume, revenue, and contribution data.” Please include information and analyses that do not support your testimony or the conclusions in your testimony. If you need to refer to particular information or documents, please identify the information or documents and refer to them.